

Baker & Hostetler LLP

45 Rockefeller
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Mark A. Kornfeld
Elizabeth A. Scully

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CARDINAL MANAGEMENT, INC., AND
DAKOTA GLOBAL INVESTMENTS, LTD.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04287 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND
AND ADJOURNING PRETRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants Cardinal Management, Inc. (“Cardinal Management”) and Dakota Global Investments, Ltd. (“Dakota”) (collectively “Defendants”) may move, answer or otherwise respond to the complaint (the “Complaint”) filed in the above-captioned adversary proceeding is extended up to and including January 16, 2015. The pre-trial conference will be adjourned from July 30, 2014 to January 28, 2015 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

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This stipulation is entered into pursuant to the Order Granting Supplemental Authority To
Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No.
5600) in the above-captioned case (No. 08-01789 (SMB)).

Dated: New York, New York
July 1, 2014

BAKER & HOSTETLER LLP

By: /s/ Elizabeth A. Scully

David J. Sheehan
dsheehan@bakerlaw.com
Mark A. Kornfeld
mkornfeld@bakerlaw.com
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

Elizabeth A. Scully (*pro hac*)
escully@bakerlaw.com
Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 861-1500
Facsimile: (202) 861-1783

*Attorneys for Irving H. Picard, Esq., Trustee
for the SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC*

CLIFFORD CHANCE US LLP

By: /s/ Jeff E. Butler

Jeff E. Butler
31 West 52nd Street
New York, New York 10019
Telephone: (212) 878-8205
Facsimile: (212) 878-8375
jeff.butler@cliffordchance.com

*Attorneys for Cardinal Management, Inc. and
Dakota Global Investments, Ltd.*